Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 1 of 29

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA

09-32984

### CHAPTER 13 PLAN AND RELATED MOTIONS

Name of Debtor(s):	Lori C Morse	Case No:
This plan, dated <u>May</u>	<b>8</b> , <b>2009</b> , is:	
	ne <i>first</i> Chapter 13 plan filed in this case. modified plan, which replaces the plan dated	
D	Pate and Time of Modified Plan Confirming Hearing:	
P	lace of Modified Plan Confirmation Hearing:	
The pla	n provisions modified by this filing are:	
Credito	rs affected by this modification are:	

NOTICE: YOUR RIGHTS WILL BE AFFECTED. You should read these papers carefully. If you oppose any provision of this plan, or if you oppose any included motions to (i) value collateral, (ii) avoid liens, or (iii) assume or reject unexpired leases or executory contracts, you MUST file a timely written objection.

This plan may be confirmed and become binding, and the included motions in paragraphs 3, 6, and 7 to value collateral, avoid liens, and assume or reject unexpired leases or executory contracts may be granted, without further notice or hearing unless a written objection is filed not later than ten (10) days prior to the date set for the confirmation hearing and the objecting party appears at the confirmation hearing.

The debtor(s)' schedules list assets and liabilities as follows:

Total Assets: \$207,101.84

Total Non-Priority Unsecured Debt: \$43,583.77

Total Priority Debt: **\$479.98**Total Secured Debt: **\$103,062.00** 

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 2 of 29

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- **1. Funding of Plan.** The debtor(s) propose to pay the trustee the sum of **\$860.00 Monthly for 60 months**. Other payments to the Trustee are as follows: **NONE**. The total amount to be paid into the plan is \$\_51,600.00.
- 2. **Priority Creditors.** The Trustee shall pay allowed priority claims in full unless the creditor agrees otherwise.
  - A. Administrative Claims under 11 U.S.C. § 1326.
    - 1. The Trustee will be paid 10% of all sums disbursed except for funds returned to the debtor(s).
    - 2. Debtor(s)' attorney will be paid \$\( \frac{2,894.00}{\text{ balance due of the total fee of \$\) \( \frac{3,000.00}{\text{ concurrently with or prior to the payments to remaining creditors.} \)
  - B. Claims under 11 U.S.C. §507.

The following priority creditors will be paid by deferred cash payments pro rata with other priority creditors or in monthly installments as below, except that allowed claims pursuant to 11 U.S.C. § 507(a)(1) will be paid prior to other priority creditors but concurrently with administrative claims above:

<u>Creditor</u> <u>Type of Priority</u> <u>Estimated Claim</u> <u>Payment and Term</u>

#### 3. Secured Creditors and Motions to Value Collateral.

This paragraph provides for claims of creditors who hold debts that are secured by real or personal property of the debtors(s) but (a) are not secured solely by the debtor(s)' principal residence and (b) do not have a remaining term longer than the length of this plan.

A. Claims to Which § 506 Valuation is NOT Applicable. Claims listed in this subsection consist of debts secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor for which the debt was incurred within 910 days of the filing of the bankruptcy petition, or if the collateral for the debt is any other thing of value, the debt was incurred within 1 year of filing. See § 1325(a)(5). After confirmation of the plan, the Trustee will pay to the holder of each allowed secured claim the monthly payment in column (f) based upon the amount of the claim in column (d) with interest at the rate stated in column (e). Upon confirmation of the plan, the interest rate shown below will be binding unless a timely written objection to confirmation is filed and sustained by the Court. Payments distributed by the Trustee are subject to the availability of funds.

(a) (b) (c) (d) (e) (f)

<u>Creditor</u> <u>Collateral</u> <u>Purchase Date</u> <u>Est Claim Amt</u> <u>Interest Rate</u> <u>Monthly Paymt& Estimate Term\*\*</u>
-NONE-

B. Claims to Which §506 Valuation is Applicable. Claims listed in this subsection consist of any claims secured by personal property not described in Plan paragraph 3.A. After confirmation of the plan, the Trustee will pay to the holder of each allowed secured claim the monthly payment in column (f) based upon the replacement value as stated in column (d) or the amount of the claim, whichever is less, with interest at the rate stated in column (e). The portion of any allowed claim that exceeds the value indicated below will be treated as an unsecured claim. Upon confirmation of the plan, the valuation and interest rate shown below will be binding unless a timely written objection to confirmation is filed and sustained by the Court. Payments distributed by the Trustee are subject to the availability of funds.

(a) (b) (c) (d) (e) (f)

<u>Creditor</u> <u>Collateral</u> <u>Purchase Date</u> <u>Replacement Value</u> <u>Interest Rate</u> <u>Monthly Paymt& Estimate Term\*\*</u>
-NONE-

### \*\* THE MONTHLY PAYMENT STATED HERE SHALL BE THE ADEQUATE PROTECTION PAYMENTS PURSUANT TO 1326(a)(1)(C) TO THESE CREDITORS UNLESS OTHERWISE PROVIDED IN PARAGRAPH 11 OR BY SEPARATE ORDER OF THE COURT.

C. Collateral to be surrendered. Upon confirmation of the plan, or before, the debtor will surrender his or her interest in the collateral securing the claims of the following creditors in satisfaction of the secured portion of such creditors' allowed claims. To the extent that the collateral does not satisfy the claim, any timely filed deficiency claim to which the creditor is entitled shall be paid as a non-priority unsecured claim. The order confirming the plan shall have the effect of terminating the automatic stay as to the collateral surrendered.

Creditor -NONE-

**Collateral Description** 

Estimated Total Claim Full Satisfaction (Y/N)

- 4. Unsecured Claims.
  - Not separately classified. Allowed non-priority unsecured claims shall be paid pro rata from any distribution A. remaining after disbursement to allowed secured and priority claims. Estimated distribution is approximately 100 %. If this case were liquidated under Chapter 7, the debtor(s) estimate unsecured creditors would receive a dividend of approximately \_\_100 %.
  - В. Separately classified unsecured claims.

Creditor **Basis for Classification** Treatment -NONE-

5. Long Term Debts and claims Secured by the Debtor(s)' Primary Residence.

> Creditors listed below are either secured by the debtor(s)' principal residence or hold a debt the term of which extends beyond the term of this plan.

A. **Debtor(s) to pay claim directly.** The creditors listed below will be paid by the debtor(s) pursuant to the contract without modification, except that arrearages, if any, will be paid by the Trustee either pro rata with other secured claims or on a fixed monthly basis as indicated below.

		Regular				Monthly
		Contract	Estimated	Interest	Estimated	Arrearage
<u>Creditor</u>	<u>Collateral</u>	<u>Payment</u>	<u>Arrearage</u>	Rate	Cure Period	<b>Payment</b>
Chase Manhattan	11008 Ryall Road, Glen Allen,	0.00	0.00	0%	0 months	
	VA 23059					
	Henrico County					
HSBC Card Services	ATV	0.00	0.00	0%	0 months	

В. Trustee to pay the contract payments and the arrearages. The creditors listed below will be paid by the Trustee the regular contract monthly payments during the term of this plan. The arrearage claims, if any, will be cured by the Trustee by payments made either pro rata with other secured claims or by fixed monthly payments as indicated below.

Regular Monthly Contract Term for Estimated Interest Arrearage Creditor Collateral **Payment** Arrearage Rate Arrearage **Payment** -NONE-

- 6. Executory Contracts and Unexpired Leases. The debtor(s) move for assumption or rejection of the executory contracts and leases listed below.
  - A. **Executory contracts and unexpired leases to be rejected.** The debtor(s) reject the following executory contracts.

Creditor -NONE-

Type of Contract

## Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 4 of 29

**B.** Executory contracts and unexpired leases to be assumed. The debtor(s) assume the following executory contracts. The debtor agrees to abide by all terms of the agreement. The Trustee will pay the pre-petition arrearages, if any, through payments made pro rata with other priority claims or on a fixed monthly basis as indicated below.

Monthly

Payment Estimated for Arrears Cure Period

Creditor -NONE-

Type of Contract

<u>Arrearage</u>

#### 7. Motions to Avoid Liens.

A. The debtor(s) move to avoid liens pursuant to 11 U.S.C. § 522(f). The debtor(s) move to avoid the following judicial liens and non-possessory, non-purchase money liens that impair the debtor(s)' exemptions. Unless a written objection is timely filed with the Court, the Court may grant the debtor(s)' motion and cancel the creditor's lien. If an objection is filed, the Court will hear evidence and rule on the motion at the confirmation hearing.

Creditor -NONE-

Collateral

**Exemption Basis and Amount** 

Value of Collateral

**B.** Avoidance of security interests or liens on grounds other than 11 U.S.C. § 522(f). The debtor(s) have filed or will file and serve separate pleadings to avoid the following liens or security interests. The creditor should review the notice or summons accompanying such pleadings as to the requirements for opposing such relief. The listing here is for informational purposes only.

Creditor -NONE- Type of Lien

Description of Collateral

Basis for Avoidance

#### 8. Treatment of Claims.

- All creditors must timely file a proof of claim to receive payment from the Trustee.
- If a claim is scheduled as unsecured and the creditor files a claim alleging the claim is secured but does not timely object to confirmation of the plan, the creditor may be treated as unsecured for purposes of distribution under the plan. This paragraph does not limit the right of the creditor to enforce its lien, to the extent not avoided or provided for in this case, after the debtor(s) receive a discharge.
- If a claim is listed in the plan as secured and the creditor files a proof of claim alleging the claim is unsecured, the creditor will be treated as unsecured for purposes of distribution under the plan.
- **Vesting of Property of the Estate.** Property of the estate shall revest in the debtor(s) upon confirmation of the plan. Notwithstanding such vesting, the debtor(s) may not sell, refinance, or encumber real property without approval of the court.
- **10. Incurrence of indebtedness.** During the term of the plan, the debtor(s) shall not voluntarily incur additional indebtedness in an amount exceeding \$5,000 without approval of the court.
- 11. Other provisions of this plan:

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 5 of 29

Signatures:					09-32982
Dated: May	8, 2009				
/s/ Lori C Mors Lori C Morse	e			son M. Krumbein, Esq.	
Debtor				M. Krumbein, Esq. 43 r's Attorney	5556
Exhibits:		(s)' Budget (Schedules ss Served with plan	I and J);		
		C	ertificate of Service		
I certify Service List.	y that on <u><b>May 8,</b></u>	<b>2009</b> , I mailed a cop	y of the foregoing to the credi	itors and parties in inter	rest on the attached
			Krumbein, Esq. umbein, Esq. 43538		
		1650 Willow Suite 300 Richmond, V			
		804.673.435 Telephone N			

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 6 of 29

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In re	Lori (	C Morse			Case No.				
			Debte	or(s)	Chapter	13			
		SPECIAL NOTICE TO	) SE	CURED CR	EDITOR				
To:	4161 I	of America Piedmont Parkway Isboro, NC 27420							
	Name	of creditor							
		Card. Disputed as to amount and.or liability.							
	Descr	iption of collateral							
1.	The a	The attached chapter 13 plan filed by the debtor(s) proposes (check one):							
		To value your collateral. <i>See Section 3 of the p</i> amount you are owed above the value of the col							
		To cancel or reduce a judgment lien or a non-pu <i>Section 7 of the plan.</i> All or a portion of the an							
	oposed roy of the	hould read the attached plan carefully for the deta- elief granted, <u>unless</u> you file and serve a written ob- objection must be served on the debtor(s), their atto- objection due:	jectio	n by the date sp	ecified and appe				
	Date	and time of confirmation hearing:							
	Place	of confirmation hearing:							
				Lori C Morse					
				Name(s) of de	btor(s)				
			By:	/s/ Jason M. k	Krumbein, Esq.				
			<i>J</i> .	Jason M. Kru	mbein, Esq. 435	38			
				Signature					
				■ Debtor(s)' A	•				
				☐ Pro se debto	or				
				Jason M. Kru	mbein, Esq. 435	i38			
					ney for debtor(s)				
				1650 Willow L Suite 300	Lawn Drive				
				Richmond, V					
				Address of atte	orney [or pro se	debtor]			
					673.4358				
				Fax # <b>804.6</b>	373.4350				

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 7 of 29

### CERTIFICATE OF SERVICE

09-32984

I hereby certify that true copies of the foregoing Notice and attached Chapter 13 Plan and Related Motions were served upon the creditor noted above by

■ first class mail in conformity with the requirements of Rule 7004(b), Fed.R.Bankr.P; or

☐ certified mail in conformity with the requirements of Rule 7004(h), Fed.R.Bankr.P

on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

Signature of attorney for debtor(s)

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 8 of 29

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In re	Lori C	Morse			Case No.				
			Debto	or(s)	Chapter	13			
		SPECIAL NOTICE TO	O SE	CURE	D CREDITOR				
To:	P.O. B	Bankruptcy Dept. ox 100018 saw, GA 30156							
	Name	of creditor							
		Card. Disputed as to amount and.or liability.							
	Descri	ption of collateral							
1.	The at	The attached chapter 13 plan filed by the debtor(s) proposes ( <i>check one</i> ):							
	•	To value your collateral. <i>See Section 3 of the p</i> amount you are owed above the value of the co							
		To cancel or reduce a judgment lien or a non-p <b>Section 7 of the plan.</b> All or a portion of the a							
	posed re	hould read the attached plan carefully for the detelief granted, unless you file and serve a written objection must be served on the debtor(s), their attached	ojectio	n by the	date specified and appe				
	Date	objection due:							
	Date	and time of confirmation hearing:							
	Place	of confirmation hearing:							
				Lori C I	Morse				
					s) of debtor(s)				
			By:		on M. Krumbein, Esq.				
				Jason I Signatu	M. Krumbein, Esq. 43 ure	538			
				■ Debto	or(s)' Attorney				
				☐ Pro se	e debtor				
					M. Krumbein, Esq. 43				
					of attorney for debtor(s	)			
				1650 W Suite 3	illow Lawn Drive				
					ond, VA 23230				
					s of attorney [or pro se	debtor]			
				Tel.#	804.673.4358				
				Fax #	804.673.4350				

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 9 of 29

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on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq.

Jason M. Krumbein, Esq. 43538 Signature of attorney for debtor(s)

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 10 of 29

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In re	Lori (	C Morse		C	Case No.					
			Debt	or(s)	Chapter	13				
		SPECIAL NOTIC	E TO SE	CUREI	O CREDITOR					
To:	Attn: 3415	e Manhattan Bankruptcy Research Dept Vision Drive nbus, OH 43219								
		of creditor								
		11008 Ryall Road, Glen Allen, VA 23059 Henrico County								
	Descr	iption of collateral								
1.	The a	ttached chapter 13 plan filed by the debtor(s)	proposes (	check one	·):					
		To value your collateral. <i>See Section 3 o</i> amount you are owed above the value of								
		To cancel or reduce a judgment lien or a reserving section 7 of the plan. All or a portion of								
	posed r	hould read the attached plan carefully for the elief granted, unless you file and serve a write objection must be served on the debtor(s), the	ten objectio	n by the o	date specified and appe					
	Date	objection due:								
	Date	and time of confirmation hearing:								
	Place	e of confirmation hearing:								
				Lori C	Morse					
					) of debtor(s)					
			By:		on M. Krumbein, Esq. M. Krumbein, Esq. 43	538				
				Signatu	-					
				■ Debto	or(s)' Attorney					
				□ Pro se	• •					
				Jason M	M. Krumbein, Esq. 43	538				
					f attorney for debtor(s illow Lawn Drive	)				
				Suite 30						
					ond, VA 23230					
				Address	s of attorney [or pro se	debtor]				
				Tel.#	804.673.4358					
				Fax #	804.673.4350					

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 11 of 29

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on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

Signature of attorney for debtor(s)

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 12 of 29

### United States Bankruptcy Court Eastern District of Virginia

09-32984

In re	Lori C Morse		(	Case No.					
		Debto	or(s)	Chapter	13				
	SPECIAL NOTIO	CE TO SE	CURED CREDIT	OR					
То:	CitiCards Private Label Attn: Centralized Bankruptcy P.O. Box 20507 Kansas City, MO 64195								
	Name of creditor								
	Credit Card. Disputed as to amount and.or liab	oility.							
	Description of collateral								
1.	The attached chapter 13 plan filed by the debtor(s) proposes (check one):								
	To value your collateral. <i>See Section 3 of</i> amount you are owed above the value of								
	☐ To cancel or reduce a judgment lien or a <b>Section 7 of the plan.</b> All or a portion o								
	You should read the attached plan carefully for a posed relief granted, unless you file and serve a writer of the objection must be served on the debtor(s), the	tten objectio	n by the date specified	and appe					
	Date objection due:								
	Date and time of confirmation hearing:								
	Place of confirmation hearing:								
			Lori C Morse						
			Name(s) of debtor(s)		_				
		By:	/s/ Jason M. Krumbe						
			Jason M. Krumbein,	Esq. 435	i38				
			Signature						
			■ Debtor(s)' Attorney	,					
				,					
			■ Debtor(s)' Attorney □ Pro se debtor  Jason M. Krumbein,	Esq. 435					
			■ Debtor(s)' Attorney □ Pro se debtor  Jason M. Krumbein, Name of attorney for	<b>Esq. 435</b> <i>debtor(s)</i>					
			■ Debtor(s)' Attorney □ Pro se debtor  Jason M. Krumbein, Name of attorney for 1650 Willow Lawn D Suite 300	Esq. 435 debtor(s) rive					
			■ Debtor(s)' Attorney □ Pro se debtor  Jason M. Krumbein, Name of attorney for 1650 Willow Lawn D Suite 300 Richmond, VA 23230	<u>Esq. 435</u> debtor(s) rive					
			■ Debtor(s)' Attorney □ Pro se debtor  Jason M. Krumbein, Name of attorney for 1650 Willow Lawn D Suite 300	Esq. 435 debtor(s) rive ) or pro se					

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 13 of 29

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on this **May 8, 2009**.

*Isl* Jason M. Krumbein, Esq.

Jason M. Krumbein, Esq. 43538

Signature of attorney for debtor(s)

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 14 of 29

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In re	Lori (	C Morse		J	Case No.	
			Debt	or(s)	Chapter	13
		SPECIAL NOTI	CE TO SE	CURED CR	EDITOR	
To:	Depar P.O. E Richn	nonwealth of Virginia rtment of Taxation Box 1880 nond, VA 23218-1880				
	Name	of creditor				
		income taxes				
	Descr	iption of collateral				
1.	The a	ttached chapter 13 plan filed by the debtor	(s) proposes (	check one):		
	•	To value your collateral. <i>See Section 3</i> amount you are owed above the value of				
		To cancel or reduce a judgment lien or <i>Section 7 of the plan.</i> All or a portion				
	posed r	thould read the attached plan carefully for elief granted, unless you file and serve a was objection must be served on the debtor(s),	ritten objectio	on by the date sp	ecified <u>and</u> appe	
	Date	objection due:				
	Date	and time of confirmation hearing:				
	Place	e of confirmation hearing:				
				Lori C Morse		
				Name(s) of de	btor(s)	
			By:	/s/ Jason M. I	Krumbein, Esq.	
				Jason M. Kru Signature	mbein, Esq. 435	38
				■ Debtor(s)' A	Attorney	
				☐ Pro se debto	or	
					mbein, Esq. 435	
				Name of attor	ney for debtor(s) Lawn Drive	
				Suite 300		
				Richmond, V. Address of att	A 23230 orney [or pro se	debtor]
				та1 # 904 4	673.4358	
					673.4350	

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 15 of 29

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on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

Signature of attorney for debtor(s)

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 16 of 29

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In re	Lori C	Morse			Case No.	
			Debt	or(s)	Chapter	13
		SPECIAL NOTIC	E TO SE	CURED CRE	EDITOR	
To:	Bankru P.O. Bo	Card Services uptcy Department ox 5253 Stream, IL 60197				
		of creditor				
	ATV					
	_	otion of collateral				
1.	The att	ached chapter 13 plan filed by the debtor(s)	proposes (	check one):		
	•	To value your collateral. <i>See Section 3 of</i> amount you are owed above the value of				
		To cancel or reduce a judgment lien or a reserving section 7 of the plan. All or a portion of				
	posed rel	tould read the attached plan carefully for the lief granted, unless you file and serve a write bjection must be served on the debtor(s), the	ten objectio	on by the date spe	cified <u>and</u> appe	
	Date of	objection due:				
	Date a	and time of confirmation hearing:				
	Place	of confirmation hearing:				
				Lori C Morse		
				Name(s) of deb	tor(s)	
			By:	/s/ Jason M. Kı	rumbein, Esq.	
			2).	Jason M. Krum		538
				Signature		
				■ Debtor(s)' At	torney	
				☐ Pro se debtor		
				Jason M. Krum	nbein, Esq. 43	538
				Name of attorne	ey for debtor(s)	
				1650 Willow La Suite 300	awn Drive	
				Richmond, VA		
				Address of atto	rney [or pro se	debtor]
				Tel. # <b>804.67</b>	73.4358	
				Fax # <b>804.67</b>	73.4350	

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 17 of 29

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☐ certified mail in conformity with the requirements of Rule 7004(h), Fed.R.Bankr.P

on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

*Signature of attorney for debtor(s)* 

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 18 of 29

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In re	Lori (	C Morse			Case No.	
			Debt	or(s)	Chapter	13
		SPECIAL NOTION	CE TO SE	CURED	O CREDITOR	
То:	P.O. E	nt Federal Cu Box 25132 on Salem, NC 27114				
10.		of creditor				
	Notice	e Only. Disputed as to amount and.or lia	bility.			
	Descr	iption of collateral				
1.	The a	ttached chapter 13 plan filed by the debtor(	s) proposes (	check one)	):	
		To value your collateral. <i>See Section 3</i> amount you are owed above the value o				
		To cancel or reduce a judgment lien or a <b>Section 7 of the plan.</b> All or a portion of				
	posed re	hould read the attached plan carefully for elief granted, unless you file and serve a wrobjection must be served on the debtor(s), to	itten objectio	n by the d	ate specified and appe	
	Date	objection due:				
	Date	and time of confirmation hearing:				
	Place	of confirmation hearing:				
				Lori C N	lorse .	
				Name(s)	of debtor(s)	
			By:	/s/ Jaso	n M. Krumbein, Esq.	
			·	Jason N Signatur	በ. Krumbein, Esq. 43 $rac{c}{c}$	338
				■ Debto	r(s)' Attorney	
				☐ Pro se	debtor	
				Jason M	Ո. Krumbein, Esq. 43է	538
				Name of	fattorney for debtor(s)	
				Suite 30		
					nd, VA 23230	<del></del>
				Address	of attorney [or pro se	debtor]
				Tel. #	804.673.4358	
				Fax #	804.673.4350	

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 19 of 29

#### CERTIFICATE OF SERVICE

09-32984

I hereby certify that true copies of the foregoing Notice and attached Chapter 13 Plan and Related Motions were served upon the creditor noted above by

■ first class mail in conformity with the requirements of Rule 7004(b), Fed.R.Bankr.P; or

☐ certified mail in conformity with the requirements of Rule 7004(h), Fed.R.Bankr.P

on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

*Signature of attorney for debtor(s)* 

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 20 of 29

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In re	Lori (	C Morse			Case	e No.	
			Debt	or(s)	Chaj	pter	13
		SPECIAL NOTICE T	O SE	CUREI	D CREDITOI	R	
				CORL			
To:	Ро Во	o/dress Barn x 182273 nbus, OH 43218					
	Name	of creditor					
		Card. Notice Only. Disputed as to amount ar	nd.or li	ability.			_
	Descri	iption of collateral					
1.	The at	tached chapter 13 plan filed by the debtor(s) projection	poses (	check one	?):		
	•	To value your collateral. <i>See Section 3 of the</i> amount you are owed above the value of the c					
		To cancel or reduce a judgment lien or a non- Section 7 of the plan. All or a portion of the					
	posed re of the o	hould read the attached plan carefully for the delief granted, unless you file and serve a written objection must be served on the debtor(s), their at	bjectio	n by the	date specified and	d appe	
		objection due:					
		and time of confirmation hearing:					
	Place	of confirmation hearing:					
				Lori C I			
				Name(s	e) of debtor(s)		
			By:	/s/ Jaso	on M. Krumbein,	Esq.	
			•		M. Krumbein, Es	q. 435	38
				Signatu	re		
				■ Debto	or(s)' Attorney		
					M. Krumbein, Es	_	J
					f attorney for deb Iill <mark>ow Lawn Drive</mark>		
				Suite 3	00		
					ond, VA 23230 s of attorney [or 1	oro se	<u>debtorl</u>
					J J I		
				Tel. # Fax #	804.673.4358 804.673.4350		
				ι αλ π	304.0.3.4000		

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 21 of 29

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on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

Signature of attorney for debtor(s)

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 22 of 29

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In re	Lori (	C Morse			Case No.	
			Debt	or(s)	Chapter	13
		SPECIAL NOTIC	EE TO SE	CURED CR	EDITOR	
То:	80 Mir	er & Associates, P.C. nuteman Road ver, MA 01810				
	Name	of creditor				
	Descr	iption of collateral				
1.	The a	ttached chapter 13 plan filed by the debtor(s)	) proposes (	check one):		
	•	To value your collateral. <i>See Section 3 o</i> amount you are owed above the value of	-			•
		To cancel or reduce a judgment lien or a Section 7 of the plan. All or a portion of				
	posed re	hould read the attached plan carefully for the elief granted, unless you file and serve a write objection must be served on the debtor(s), the	ten objectio	on by the date sp	ecified and appe	
	Date	objection due:				
	Date	and time of confirmation hearing:				
	Place	of confirmation hearing:				
				Lori C Morse		
				Name(s) of de	btor(s)	
			By:	/s/ Jason M. k	Krumbein, Esq.	
			2).	Jason M. Kru	mbein, Esq. 43	538
				Signature		
				■ Debtor(s)' A	ttorney	
				☐ Pro se debto	or	
				Jason M. Kru	mbein, Esq. 43	538
					ney for debtor(s	
				1650 Willow L Suite 300	awn Drive	
				Richmond, V		dobtoul
				Aaaress of att	orney [or pro se	aeviorj
					73.4358	
				Fax # <b>804.6</b>	73.4350	

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 23 of 29

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on this **May 8, 2009**.

/s/ Jason M. Krumbein, Esq. Jason M. Krumbein, Esq. 43538

Signature of attorney for debtor(s)

# Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 24 of 29

**B6I (Official Form 6I) (12/07)** 

In re	Lori C Morse		Case No.	09-32984
		Debtor(s)		

### SCHEDULE I - CURRENT INCOME OF INDIVIDUAL DEBTOR(S)

The column labeled "Spouse" must be completed in all cases filed by joint debtors and by every married debtor, whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed. Do not state the name of any minor child. The average monthly income calculated on this form may differ from the current monthly income calculated on Form 22A, 22B, or 22C.

Debtor's Marital Status:	DEPENDENTS	S OF DEBTOR A	ND SPOUSE		
Debtor's Maritar Status.	RELATIONSHIP(S):		GE(S):		
Married	Daughter		14		
Employment:	DEBTOR		SPOUSE		
Occupation	Child Care Provider				
Name of Employer	Carol Scott Daycare	Dougher	ty Equipment Comp	any	
How long employed	8 months				
Address of Employer	11097 Ryall Road Glen Allen, VA 23059	2302 Soa Greensb	abar St. oro, NC 27406		
	or projected monthly income at time case filed)		DEBTOR		SPOUSE
1. Monthly gross wages, salary, a	and commissions (Prorate if not paid monthly)		\$ <u>1,040.00</u>	\$	4,583.34
2. Estimate monthly overtime			\$	\$	0.00
3. SUBTOTAL			\$1,040.00	\$	4,583.34
4. LESS PAYROLL DEDUCTION					
<ul> <li>a. Payroll taxes and social s</li> </ul>	security		\$ <u>157.99</u>	\$	778.30
b. Insurance			\$ 0.00	\$	414.00
c. Union dues	<b>.</b> . <b>.</b>		\$ 0.00	\$ <u> </u>	0.00
d. Other (Specify)	ee Detailed Income Attachment		\$	\$	911.90
5. SUBTOTAL OF PAYROLL I	DEDUCTIONS		\$157.99	\$	2,104.20
6. TOTAL NET MONTHLY TA	KE HOME PAY		\$882.01	\$	2,479.14
	n of business or profession or farm (Attach detailed sta	atement)	\$0.00_	\$	0.00
8. Income from real property			\$ 0.00	\$	0.00
9. Interest and dividends			\$ <u>0.00</u>	\$	0.00
dependents listed above	oport payments payable to the debtor for the debtor's us	se or that of	\$	\$	0.00
11. Social security or governmen (Specify):	it assistance		\$ 0.00	•	0.00
(Specify).			\$ 0.00	\$ <del></del>	0.00
12. Pension or retirement income	<u> </u>		\$ 0.00	\$ <del>-</del>	0.00
13. Other monthly income	•		Ψ 0.00	Ψ	0.00
(Specify):			\$ 0.00	\$	0.00
			\$ 0.00	\$	0.00
14. SUBTOTAL OF LINES 7 TH	HROUGH 13		\$	\$	0.00
15. AVERAGE MONTHLY INC	COME (Add amounts shown on lines 6 and 14)		\$882.01	\$	2,479.14
16. COMBINED AVERAGE MO	ONTHLY INCOME: (Combine column totals from lin	ne 15)	\$	3,361.	15

(Report also on Summary of Schedules and, if applicable, on Statistical Summary of Certain Liabilities and Related Data)

17. Describe any increase or decrease in income reasonably anticipated to occur within the year following the filing of this document:

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 25 of 29

**B6I (Official Form 6I) (12/07)** 

In re	Lori C Morse	Case No. $09-32$	984
	Debtor(s)		

### $\underline{SCHEDULE~I-CURRENT~INCOME~OF~INDIVIDUAL~DEBTOR(S)}$

### **Detailed Income Attachment**

#### **Other Payroll Deductions:**

Dep Life	\$ 0.00	\$ 1.60
Life Post Tax	\$ 0.00	\$ 43.50
Spousal Life	\$ 0.00	\$ 28.50
ST Disability	\$ 0.00	\$ 46.54
Child Support	\$ 0.00	\$ 541.76
Tax Levy	\$ 0.00	\$ 250.00
<b>Total Other Payroll Deductions</b>	\$ 0.0	\$ 911.90

Case 09-32984-KLP Doc 2 Filed 05/08/09 Entered 05/08/09 09:54:17 Desc Main Document Page 26 of 29

R6I	(Officia	Form	<b>6T</b> )	(12/07)

In re	Lori C Morse		Case No.	09-32984
		Debtor(s)		

### SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S)

Complete this schedule by estimating the average or projected monthly expenses of the debtor and the debtor's family at time case

filed. Prorate any payments made bi-weekly, quarterly, semi-annually, or annually expenses calculated on this form may differ from the deductions from income allow	
☐ Check this box if a joint petition is filed and debtor's spouse maintains a separate expenditures labeled "Spouse."	te household. Complete a separate schedule of
1. Rent or home mortgage payment (include lot rented for mobile home)	\$ 904.50
a. Are real estate taxes included? Yes X No	)
- · · · ·	)
2. Utilities: a. Electricity and heating fuel	\$ 325.00
b. Water and sewer	\$ 0.00
c. Telephone	\$ 0.00
d. Other See Detailed Expense Attachment	\$ <u>165.18</u>
3. Home maintenance (repairs and upkeep)	\$ 0.00
4. Food	\$ 473.00
5. Clothing	\$ 50.00
6. Laundry and dry cleaning	\$ <u>40.00</u> \$ 30.00
7. Medical and dental expenses 8. Transportation (not including car payments)	\$ <u>30.00</u> \$ 40.00
9. Recreation, clubs and entertainment, newspapers, magazines, etc.	\$ <u>40.00</u> \$ 0.00
10. Charitable contributions	\$ 0.00 \$
11. Insurance (not deducted from wages or included in home mortgage payments)	\$
a. Homeowner's or renter's	\$ 0.00
b. Life	\$ <u>34.67</u>
c. Health	\$ <u>0.00</u>
d. Auto	\$ 58.06
e. Other	\$ 0.00
12. Taxes (not deducted from wages or included in home mortgage payments)	Ψ
(Specify)	\$ 0.00
13. Installment payments: (In chapter 11, 12, and 13 cases, do not list payments to	
plan)	be included in the
a. Auto	\$ 0.00
b. Other	\$ 0.00
c. Other	\$ 0.00
14. Alimony, maintenance, and support paid to others	\$ 0.00
15. Payments for support of additional dependents not living at your home	\$ 0.00
16. Regular expenses from operation of business, profession, or farm (attach details	
17. Other Personal Care & Contingency Expenses	\$ 100.00
Other	\$ 0.00
	Ψ
18. AVERAGE MONTHLY EXPENSES (Total lines 1-17. Report also on Summa if applicable, on the Statistical Summary of Certain Liabilities and Related Data.)	ry of Schedules and, \$ 2,220.41
<ul> <li>19. Describe any increase or decrease in expenditures reasonably anticipated to occ following the filing of this document: None expected.</li> <li>20. STATEMENT OF MONTHLY NET INCOME</li> </ul>	ur within the year
A 11 ' C I' 15 CC 1 1 1 I	\$ 3,361.15
	\$ 3,361.15 \$ 2,220.41
	\$ <u>2,220.41</u> \$ 1,140.74
c. Monthly net income (a. minus b.)	Φ1,140.74

	Case 09-32984-KLP	Doc 2		Entered 05/0 age 27 of 29	18/09 09:54:17	Desc Main
B6J (Offi	icial Form 6J) (12/07)		Doddinent 1 a	.gc 27 01 23		
In re	Lori C Morse				Case No.	
			Debto	or(s)		09-32984

# SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S) Detailed Expense Attachment

### **Other Utility Expenditures:**

irasn	\$ 30.00
Cable, internet, telephone	\$ 135.18
Total Other Utility Expenditures	\$ 165.18

09-32984

Lori C Morse 11008 Ryall Rd Glen Allen, VA 23059

Commonwealth of Virginia Director of Finance P.O. Box 760 Richmond, VA 23218-0760

Robert B. Van Arsdale Assistant U.S. Trustee 701 E. Broad Street, Suite 4304 Richmond, VA 23219-1885

Internal Revenue Service P.O. Box 21126 Philadelphia, PA 19114

Bank of America 4161 Piedmont Parkway Greensboro, NC 27420

Chase Attn: Bankruptcy Dept. P.O. Box 100018 Kennesaw, GA 30156

Chase Manhattan Attn: Bankruptcy Research Dept 3415 Vision Drive Columbus, OH 43219

CitiCards Private Label Attn: Centralized Bankruptcy P.O. Box 20507 Kansas City, MO 64195

Commonwealth of Virginia Department of Taxation P.O. Box 1880 Richmond, VA 23218-1880

HSBC Card Services Bankruptcy Department P.O. Box 5253 Carol Stream, IL 60197

09-32984

Truliant Federal Cu P.O. Box 25132 Winston Salem, NC 27114

Wfnnb/dress Barn Po Box 182273 Columbus, OH 43218

Zwicker & Associates, P.C. 80 Minuteman Road Andover, MA 01810